

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
CONNIE BRAUN CASEY, individually,
ANDREW SAWYER, individually, and
JANE DOE 2,**

Plaintiffs,

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC. and
ANGELA SCOTT a/k/a ANGELA G.
CAGNASSO, individually,**

Defendants.

Case No. 4:16-cv-02163

SUPPLEMENTAL DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. (“PETA”) and Angela Scott (“Scott”). I make this declaration based upon my personal knowledge and upon information available to me as PETA’s and Scott’s counsel.

2. On June 6, 2018, my co-counsel Martina Bernstein and I conferred with Daniel Batten, counsel to Counterclaim Defendant Connie Braun Casey, regarding Casey’s failure to provide any documents related to her transfer of chimpanzees to DeYoung Family Zoo with her Rule 26 disclosures. Mr. Batten could or would not confirm during that conference or in subsequent email correspondence whether Casey was or was not in possession of any documents or written communications regarding the transfer of the chimpanzees—other than the APHIS Form 7020 completed by the parties to the transfer, whether there were ever any such documents or

written communications, or whether Casey specifically searched for and concluded that no such records exist.

3. On December 13, 2016, I sent a letter to Casey and Counterclaim Defendant Andrew Sawyer to follow-up on Counterclaim Plaintiffs' notice of intent to sue and further urge the initiation of discussions regarding the chimpanzees' transfer to a sanctuary or sanctuaries accredited by the Global Federation of Animal Sanctuaries. A true and correct copy is attached hereto as **Exhibit A**.

4. On June 12, 2018, Casey served on Counterclaim Plaintiffs via regular mail her overdue responses and objections to Counterclaim Plaintiffs' First Requests for Production, as well as her first (and as of the time of this filing, only) document production.

I declare under the penalty of perjury that the foregoing is true and correct.

June 25, 2018

Los Angeles, CA

/s/ Jared Goodman
Jared Goodman